

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:

Todd A. Brunner and
Sharon Y. Brunner,

Case No. 11-29064
Chapter 11

Debtors.

**APPLICATION TO APPROVE THE
EMPLOYMENT OF COUNSEL FOR THE DEBTORS**

Todd A. Brunner and Sharon Y. Brunner, Debtors and Debtors-in-Possession, request that the Court enter an *Order* authorizing the employment of the Law Offices of Jonathan V. Goodman as counsel under a general retainer under the terms and conditions described in this *Application*.

1. The Debtors filed a *Petition* for Relief under Chapter 11 of Title 11, United States Code on June 5 , 2011, and are operating their business as the Debtors-in-Possession.
2. The Debtors have selected the Law Offices of Jonathan V. Goodman as their counsel, subject to the approval of the Bankruptcy Court, to represent and advise the Debtors on all matters arising in or relating to this Chapter 11 proceeding.
3. The Debtors have selected the Law Offices of Jonathan V. Goodman because Jonathan V. Goodman has substantial experience in matters relating to insolvency, reorganization, bankruptcy law, and particularly, has appeared before this Court in previous cases involving debtors-in-possession.

Law Offices of Jonathan V. Goodman
135 West Wells Street - Suite 340
Milwaukee, WI 53203-1807
Phone: (414) 276-6760 - Fax: (414) 287-1199
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4. The professional services to be rendered by the Law Offices of Jonathan V.

Goodman are as follows:

- (a) To give the Debtors legal advice with respect to their powers and duties as Debtors-in-Possession on the management of their properties;
- (b) To prepare on behalf of your applicants, as Debtors-in-Possession, necessary applications, answers, orders, reports, and other legal papers;
- (c) To prepare a disclosure statement and a plan or plans of reorganization;
- (d) To perform other legal services for Debtors as Debtors-in-Possession, which may be necessary herein; that it is necessary for Debtors as Debtors-in-Possession to employ an attorney for such professional services.

5. To the best of the Debtors' knowledge, the Law Offices of Jonathan V. Goodman

has no connection with any other parties-in-interest or their respective attorneys in this proceeding, except as disclosed in his *Affidavit of Disinterestedness*.

6. Your applicants desire to employ the Law Offices of Jonathan V. Goodman under a general retainer because of the extensive legal services required.

7. The Law Offices of Jonathan V. Goodman represents no interest adverse to Debtors as Debtors-in-Possession, or in the matters in which it is engaged by Debtors as Debtors-in-Possession, and its employment would be in the best interest of this estate.

8. Your applicants are informed that the Law Offices of Jonathan V. Goodman will be charging the Debtors-in-Possession for its time at the rate of \$300.00 per hour, and estimates that the total cost of its representation will be upwards of \$250,000.00, excluding out-of-pocket costs.

9. Your applicants understand that the costs for legal representation will be broken down as follows:

- (a) To represent the Debtors at the initial hearings, preparation of the Schedules, and other legal matters: \$80,000.00;
- (b) To prepare a Disclosure Statement, Plan of Reorganization, and represent Debtors at various hearings in connection therewith: \$100,000.00;
- (c) To assist Debtors in preparing monthly reports and otherwise comply with the Debtors' duties in a case of this nature: \$25,000.00; and
- (d) Other miscellaneous matters, including consummating the approved Plan of Reorganization: \$45,000.00.

WHEREFORE, your applicants pray that they be authorized to employ and appoint the said Law Offices of Jonathan V. Goodman under a general retainer to represent them as Debtors-in-Possession in this proceeding under Chapter 11 of Title 11, United States Code, and that they have such other and further relief as is just.

Dated this 05 day of April, 2011.



Todd A. Brunner
Debtor-in-Possession

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